

EXHIBIT 7



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Transcript of Tia Taylor, Designated Representative

Date: August 5, 2022
Case: Timbers -v- Telligent Masonry, LLC, et al.

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	21	23
1 be documented in writing?		
2 A I don't recall.		
3 Q So is it fair to say that you recall that		
4 there was policies that spoke to some of these		
5 topics that I'm discussing about in the handbook,		
6 but you don't recall specifically what they were?		
7 A Well, let's be clear, I referenced the		
8 disciplinary form. So they do have that process,		
9 so I guess I probably should retract that		
10 statement. They do have the disciplinary forms,		
11 and typically it should be used.		
12 Q Okay. What is the disciplinary form?		
13 A Again, it's the form that has the top half		
14 is a warning. It depends on what's going on. You		
15 can utilize that form for any disciplinary		
16 performance issues.		
17 Q Is it like a check box issue you can write		
18 in what the issue is?		
19 A It's not an entire check box, no.		
20 Q Is this what was used on Mr. Timbers for		
21 his employment situation?		
22 A Not that I know of.		
	22	24
1 Q So there's a disciplinary form that is		
2 used for disciplinary matters?		
3 A That's correct.		
4 Q Okay. So is it your understanding when		
5 there was a disciplinary matter with an employee,		
6 this form was supposed to be used?		
7 MS. GLOVER: Objection to form.		
8 You can answer.		
9 A I don't recall.		
10 Q Do you recall what the purpose of the		
11 disciplinary form was?		
12 A I mean, I've kind of stated it.		
13 Performance. Any disciplinary actions. Of course		
14 terminations, and things of that nature.		
15 Q Are supposed to be written on this form?		
16 A Yes.		
17 Q Okay. Ms. Taylor, do you have any		
18 recollection of whether prior to Mr. Timbers'		
19 termination from Telligent on		
20 September 23rd, 2020, whether there was any		
21 existing disciplinary forms contained in		
22 Telligent's file of him?		

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1	Albert Timbers, discussed at all during this	1	A His name was David.
2	conversation?	2	Q Arnold?
3	A With David.	3	A Yes.
4	Q When David called?	4	Q Okay. That's what I thought.
5	A Yes.	5	So you didn't tell him anything about your
6	Q But when you talked to Mr. Valladares you	6	conversation or Mr. Valladares, you just asked
7	were speaking just about David Timbers?	7	what his thoughts on Mr. Timbers were and he
8	A I don't recall if other people became --	8	unloaded on you?
9	he spoke about other people, I can't recall. I	9	A That's correct. Pretty much. I don't
10	know he pointed at me in the direction of Nieshia	10	think David is an employee of the company.
11	and David, I know that much.	11	Q Gotcha. So you spoke with Mr. Arnold, you
12	Q Did he say whether Mr. Albert Timbers was	12	spoke with Ms. Williams, she said she stopped
13	a horrible worker?	13	working Mr. Timbers?
14	A He made reference to it, the family.	14	A That's correct.
15	Q He made reference to the family being	15	Q Did she say why she stopped working him?
16	horrible workers?	16	A She said that he had a random couple
17	A Right. That worked for Telligent.	17	coming to the plant looking for money that he owed
18	Q Because my next question to you was	18	them. And then in addition to his bricklaying
19	whether he provided a response to why	19	skills, which she later sent pictures of.
20	Mr. Albert Timbers wasn't working, but I think you	20	Q Did she say why the couple coming to the
21	just answered that question, he said the Timbers	21	plant bothered her?
22	family are horrible workers?	22	A I don't recall.
	30		32
1	A Right.	1	Q But she also did reference poor work
2	Q And that's why he was not working him;	2	performance?
3	rite?	3	A That's correct.
4	A Yes. And the threats.	4	Q Okay. So you've talked to Ms. Williams
5	Q And the threats. So after you learned	5	now, you've talked to Mr. Arnold, you've talked to
6	that information from Mr. Valladares, what did you	6	Mr. Valladares, Mr. Timbers, what do you do next?
7	do next?	7	Is this all on the 23rd?
8	A I continued on the direction that he	8	A Yes.
9	pointed me in. He said that other people could	9	Q So these conversations all happened in
10	attest to what's been going on. And so when I	10	close proximity?
11	I talked to David, I just asked him, hey what's your	11	A That's correct.
12	experience with David Timbers. I didn't mention	12	Q What do you do next?
13	anything that Timbers had told me, of course, and	13	A So at that present time I complete the
14	he just unloaded and told me what his issue was.	14	paperwork that I'm assigned to complete, which is
15	I think he said the cops or something. I think he	15	that employee complaint form, there's a section
16	was the one who said the cops were looking for	16	that HR has to fill out.
17	him. And then I contacted Nieshia as well. She	17	Q Let's take a look at that. I think I have
18	actually said she stopped working him at her	18	it in here somewhere.
19	plant. This was January of that year.	19	A Sure.
20	Q And I apologize, Ms. Taylor, if I missed	20	(TAYLOR Deposition Exhibit 2 marked for
21	this, I got Nieshia, you called Nieshia. Who was	21	identification and attached to the transcript.)
22	the first person you were referring to?	22	Q Ms. Taylor, take a look at number two, and

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1 A Yes. 2 Q And did you attach documentation to this 3 at all? 4 A That's correct. I referenced the 5 documentation that I attached in this position 6 statement. 7 Q It looks like Section 7-1, expectations, 8 7-3, insubordination, these are from the employee 9 handbook? 10 A Yes. 11 Q Okay. Did you put any other information 12 with this when you sent it? 13 A Yes. 14 Q And what information was that? 15 A I think it was – the complaint form was 16 one of them. And I think it was something else, 17 but that's in the email when I sent it to the 18 Pappases, I list what else I attached. I thought 19 it was in this, but it's not. No, it does say, 20 please see attached employee complaint 21 investigation. So that's what was sent. 22 Q Focusing on the second paragraph here, you	61	1 Mr. Pappas, if anything, at that time? 2 A Whatever I'm instructed to do. 3 Q Okay. As far as the investigation went, 4 did you ever investigate Mr. Timbers's claims of 5 being denied work and Hispanic masons being 6 allowed to work, anything like that? 7 A Absolutely. 8 Q What did you do with respect to that. 9 A That was my point of calling Jose. 10 Q Okay. 11 A That was my point of speaking with Nieshia 12 about that as well, because it was important for 13 me to find out if there was an underlying issue. 14 Q Did Jose indicate whether Hispanic masons 15 were continued to be allowed to work? 16 A No. He said it wasn't a race thing. He 17 said he was terrified of this man. 18 Q Okay. So there's a couple of emails that 19 I want to talk to you about now, Ms. Taylor, that 20 took place during the February 2021 time frame. 21 A Okay. 22 Q So I'm going to probably show them to you	63
1 write, I opened an unbiased internal investigation 2 that day to address his concerns. I notified 3 Mr. Timbers during our phone call that I would 4 conduct a full investigation on his claims. 5 A That's correct. 6 Q Did you feel that you conducted a full 7 investigation? 8 A As far as I was allowed to go, absolutely. 9 Q Okay. So I'm going to obviously ask you 10 some follow-up questions on that. 11 A Sure. 12 Q What did you mean by as far as you were 13 allowed to go? 14 A Well, after I gathered that particular 15 information – well, let's just say as far as I 16 knew to go. 17 Q Okay. 18 A I spoke to everybody involved, and I sent 19 it over to Michael. So from there I just followed 20 instructions. 21 Q Okay. What would you have done if you 22 weren't instructed to terminate Mr. Timbers by	62	1 all at the same time. 2 (TAYLOR Deposition Exhibits 9 and 10 3 marked for identification and attached to the 4 transcript.) 5 Q Let's start with this one. This looks 6 like an email from you to Mr. Arnold and you say, 7 hi, David, so I'm guessing this is David Arnold, 8 does that sound right? 9 A That's correct. 10 Q So my question to you, Ms. Taylor, is why 11 are you sending Mr. Arnold an e-mail on 12 February 15th, 2021, involving Mr. Timbers? 13 MR. DeGENNARO: I'm going to object for 14 the record. I believe this was after suit was 15 filed, so I don't know if it's relevant. 16 But certainly go ahead and answer. 17 Q You can answer. 18 A That meeting came about because the 19 Pappases wanted everybody to meet. 20 Q Okay. So you're talking about the 21 substance of the first paragraph where it says, 22 we're going to have a headquarters meeting to	64